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AWMD/WRAP-KNRP

June 14, 2013

Mr. Bruce Morrison Project Manager U.S. Environmental Protection Agency, Region 7 11201 Renner Boulevard Lenexa, KS 66219

RE: Monthly Progress Report Solutia – John F. Queeny Plant St. Louis, Missouri EPA ID No. MOD 004 954 111

Dear Mr. Morrison:

Environmental Operations, Inc. (EOI), on behalf of SWH Investments, is providing this Monthly Progress Report for the John F. Queeny Plant formerly owned by Solutia. We are providing this Progress Report in order accordance with the reporting requirements of the EPA Docket No. RCRA-07-2009-0015 Consent Order which became effective December 18, 2009. Per the Interim Measures Work Plan, these reports will be submitted every month.

Reporting Period

May 1, 2013 – May 31, 2013

Description of the work conducted pursuant to the Order during the reporting period.

- EOI completed review of preliminary groundwater laboratory analytical results for the March/April 2013 event and approved the lab to release final reports.
- EOI deferred further delineation in the VV Area for PCB concentrations less than 100 and greater than 10 parts per million (ppm). This work will occur following additional removal of soil in the VV area identified during initial delineation as having greater than 100 ppm PCBs.
- EOI submitted groundwater data to Regenesis and met with Ryan Moore to begin design of the final injection event.

Estimate of the percentage of the project completed during the reporting period

• 1%

RCRA

Environmental Consulting & Remediation, Demolition, & Geotechnical Engineering 1530 South Second Street • Saint Louis, Missouri 63104–4500 • 314–241–0900

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Description of the projects scheduled for completion during the reporting period which were not completed; statement explaining why and updated completion date.

• Not applicable.

Copies of all data and sampling and test results and all other laboratory deliverables received by Respondent during the reporting period.

• The attached CD contains the groundwater data reports for the sampling event completed in April 2013. If paper copies are needed, please advise.

Description of the projects and actions which are scheduled for the following reporting period.

- EOI will meet continue design work with Regenesis for the final injection event. The plan is to finish design in June and schedule the work.
- EOI will completed and submit the Semi-Annual Groundwater Monitoring Report.
- EOI will update waste profile information with Heritage for disposal of PCB soil from the VV Building in preparation for additional removal of soil with greater than 100 ppm PCB. After that is accomplished, scheduling of the work will occur.
- EOI/SWH will continue to work with the EPA regarding financial assurance information modifications and will respond accordingly.

If there are questions or concerns related to this Progress Report please contact Larry Rosen or Matt Robinson or who can be reached by phone at (314) 241-0900, or via email at larryr@environmentalops.com or matt@environmentalops.com.

Respectfully submitted,

ENVIRONMENTAL OPERATIONS, INC.

awreny C. Jose

Lawrence C. Rosen, R.G. Senior Project Manager

Attachment: CD containing Pace Analytical Laboratory Reports

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60142325, 60142733

Copy: Mr. Michael House/Solutia

Ms. Christine Kump-Mitchell/MDNR

Mr. Rich Nussbaum/ MDNR